



1 2. I am duly authorized to practice law before this Court.

2  
3 3. I have served Craig Moore of the United States Attorney's Office with a copy of the  
4 Complaint filed on May 30, 2008.

5  
6  
7 4. The Complaint as filed alleges that certain irreparable harm will befall the Plaintiff if  
8 the Temporary Restraining Order is not issued.

9  
10 5. On May 30, 2008, I contacted the U.S. Attorney's Office on Saipan by telephone to  
11 inform them of my intent to file this Motion. When I called, no one in the Office was available  
12 and I left a message with my name and reason for the filing of this Motion. Later in the day,  
13 Jessica Cruz from the U.S. Attorney's Office in Guam contacted me. Ms. Cruz could not  
14 stipulate to a hearing time for the TRO and filing under seal motions without conferring with  
15 others in the US government, so I stated that I would request a hearing for Friday, June 6, 2008  
16 in the hopes that we could work something out before then. Ms. Cruz agreed that this would be  
17 a good manner in which to proceed.  
18

19  
20  
21 6. This Motion is presently being filed to calendar hearings on Plaintiff's motion to file tax  
22 documents under seal and motion for Temporary Restraining Order at the Court and counsels'  
23 earliest convenience.

24  
25 7. Plaintiff requests that the Court schedule the hearing, if possible, on Friday, June 6,  
26 2008.  
27  
28

1 Signed under penalty of perjury, on Saipan, Commonwealth of the Northern Mariana  
2 Islands, this 30<sup>th</sup> day of May, 2008.

3 \_\_\_\_\_/s/\_\_\_\_\_  
4 Gregory J. Koebel, Esq.

5  
6 *K:/3495-01 Baldwin/3495-01-080530-DecGregMotionShortenTime.doc*  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28